

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

NICOLE JENNINGS WADE,	)	
JONATHAN D. GRUNBERG, and	)	
G. TAYLOR WILSON,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	CIVIL ACTION
L. LIN WOOD,	)	
	)	FILE NO. 1:22-cv-1073-MLB
Defendant.	)	
_____	)	

**CONSENT MOTION TO ENLARGE TIME TO FILE ANSWER OR  
OTHERWISE RESPOND TO COMPLAINT**

Comes now Defendant L. LIN WOOD, with the consent of Plaintiffs' counsel, and hereby respectfully requests an extension of time through and including June 3, 2022 to file his responsive pleading or pleadings to Plaintiffs' Verified Complaint for Defamation.

The Court entered an Order on April 21, 2022, lifting the stay of this matter and directing the Defendant to file a response to the Plaintiffs' Complaint by Monday, May 23, 2022. Defendant requests a new filing deadline of June 3, 2022. Plaintiffs' counsel has consented to the extension.

Good cause exists for the Court to grant this Motion under Fed. R. Civ. P. 6(b), to wit: a) counsel for Defendant was retained after the Court conducted a hearing on

recusal issues, and b) a determination of insurance coverage between Defendant and Georgia Farm Bureau Mutual Insurance Company (hereinafter referred to as “Farm Bureau”) is ongoing. In particular, a separate Complaint for Declaratory Judgment has recently been filed by Farm Bureau in state court.

Therefore, pursuant to Fed. R. Civ. P. 6(b), the parties hereby stipulate and request that Defendant, L. LIN WOOD, have through June 3, 2022 to file his responsive pleading or pleadings to Plaintiffs’ Verified Complaint for Defamation.

This 20<sup>th</sup> day of May, 2022.

**Prepared and filed by:**

**DOWNEY & CLEVELAND, LLP**

By: /s/ R. CHRISTOPHER HARRISON

R. Christopher Harrison, Esq.  
Georgia Bar No. 333199  
Attorneys for Defendant

Downey & Cleveland, LLP  
288 Washington Ave  
Marietta, GA 30060

**Consented to:**

**BUCKLEY BEAL LLP**

By: /s/ MILINDA BROWN

Andrew M. Beal, Esq.  
Georgia Bar No. 043842  
Milinda Brown, Esq.  
Georgia Bar No. 363307  
Attorneys for Plaintiffs

BUCKLEY BEAL LLP  
600 Peachtree Street, NE, Suite 3900  
Atlanta, GA 30308

